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*Attorneys for Defendant,  
ROLLER CLUTCH TOOLS, LLC*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEVADA**

JS PRODUCTS, INC., a Nevada corporation,

Plaintiffs,

v.

ROLLER CLUTCH TOOLS, LLC,  
a California limited liability company,

Defendant.

Case No. 2:17-cv-02615-GMN-GWF

**STIPULATION REGARDING  
EXTENSION OF TIME FOR PLAINTIFF  
TO RESPOND TO DEFENDANT'S  
MOTION TO DISMISS; AND TO REPLY  
TO ITS MOTION TO ENJOIN ROLLER  
CLUTCH FROM PROSECUTING CASE  
AGAINST DEFENDANT BEFORE THE  
EASTERN DISTRICT TO TEXAS**

**(Second Request for Extension to Respond  
to Motion to Dismiss)**

**(Third Request for Extension to Reply to Its  
Motion to Enjoin Roller Clutch)**

1 Pursuant to Fed. R. Civ. P. 6(b)(1)(A), Local Rules 6-1 and 6-2, Plaintiff JS Products,  
2 Inc. ("JS Products" or "Plaintiff") has requested, and Defendant Roller Clutch Tools, LLC  
3 ("Roller Clutch" or "Defendant") has agreed to, a two week extension of time, until **January**  
4 **19, 2018**, for Plaintiff to file its Response to Defendant's Motion to Dismiss for Lack of  
5 Personal Jurisdiction Under Fed. R. Civ. P. 12(b)(2) and Improper Venue Under Fed. R. Civ. P.  
6 12(b)(3). (ECF No. 30, "Motion"). This is the Parties' second request for an extension of the  
7 deadline to oppose the Motion. The Motion was originally filed on December 15, 2017 and the  
8 opposition is currently scheduled to be due on or before January 5, 2018.

9 Further, Defendant has also agreed to, a two week extension of time, until **January 19,**  
10 **2018**, for Plaintiff to file its Reply to Its Motion to Enjoin Roller Clutch Tools, LLC from  
11 Prosecuting its Case Against Defendant before the United States District Court for the Eastern  
12 District of Texas. (ECF No. 07, "Motion"). This is the Parties' third request for an extension  
13 of the deadline to oppose the Motion. The Motion was originally filed on October 20, 2017,  
14 the Opposition (ECF No. 29, "Opposition") was filed December 15, 2017 and the Reply is  
15 currently scheduled to be due on or before January 5, 2018.

16 **Good cause exists for this Court to grant the extension because the Parties have**  
17 **reached an agreement in principle that settles all matters in controversy between them.**  
18 The Parties respectfully and jointly request that this Court grant the requested extension to  
19 allow the agreement to be finalized, settlement obligations to be met and a dismissal  
20 stipulation to be filed with the Court.

21 Accordingly, the Parties hereby stipulate that Plaintiff has until **January 19, 2018** to  
22 file its Opposition to Defendant Roller Clutch's Motion to Dismiss for Lack of Personal  
23 Jurisdiction Under Fed. R. Civ. P. 12(b)(2) and Improper Venue Under Fed. R. Civ. P.  
24 12(b)(3); and to Reply to Its Motion to Enjoin Roller Clutch Tools, LLC from Prosecuting its  
25 Case Against the Defendant in the matter before the United States District Court for the  
26 Eastern District of Texas.

1 Dated: January 4, 2018

**MCDONALD CARANO LLP**

2  
3 /s/ Craig A. Newby

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24 *Attorneys for Plaintiff, JS Products, Inc.*

1 Dated: January 4, 2018

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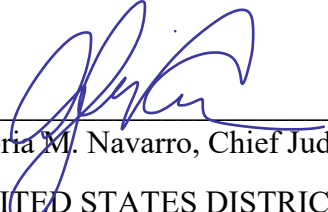
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13 *Attorneys for Defendant, Roller Clutch Tools, LLC*

14  
15 **IT IS SO ORDERED.**

16  
17 DATED this <sup>12</sup> day of January, 2018.

18   
Gloria M. Navarro, Chief Judge

19 UNITED STATES DISTRICT COURT

1 **CERTIFICATE OF SERVICE**

2 I HEREBY CERTIFY that I am an employee of McDonald Carano LLP, and that on  
3 January 4, 2018, I caused a true and correct copy of the foregoing **STIPULATION**  
4 **REGARDING EXTENSION OF TIME FOR PLAINTIFF TO RESPOND TO**  
5 **DEFENDANT'S MOTION TO DISMISS; AND TO REPLY TO ITS MOTION TO**  
6 **ENJOIN ROLLER CLUTCH FROM PROSECUTING CASE AGAINST DEFENDANT**  
7 **BEFORE THE EASTERN DISTRICT TO TEXAS**, to be served via the U.S. District Court's  
8 Notice of Electronic Filing ("NEF") in the above-captioned case to:

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27 *Attorneys for Defendant,*  
28 *Roller Clutch Tools, LLC*

29 */s/ Brian Grubb*  
30 \_\_\_\_\_  
31 An Employee of McDonald Carano LLP